

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

| | | |
|---------------------------------|---|----------------------------|
| A.L.L. CONSTRUCTION, LLC, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. 4:17-CV-02367-AGF |
| |) | |
| THE METROPOLITAN ST. LOUIS |) | |
| SEWER DISTRICT, <i>et al.</i> , |) | |
| |) | |
| Defendants. |) | |

PLAINTIFF’S MOTION FOR HEARING AND TO SHORTEN TIME

COMES NOW Plaintiff, by and through undersigned counsel, and hereby requests this Court hear argument on Plaintiff’s Motion to Compel Discovery (Doc. 81) on Friday, September 21, 2018. Plaintiff further respectfully requests that the Court rule on Plaintiff’s Motion to Compel so as to allow for such discovery to be complete by the deadline of October 22, 2018, as established by this Court’s order (Doc. 76). Plaintiff and MSD Defendants have attempted to resolve their disagreements regarding this discovery without the Court’s intervention, but have not been able to do in sufficient time to ensure that all discovery is complete by the October 22, 2018, deadline. Accordingly, Plaintiff would suffer extreme prejudice if it is unable to obtain all discovery to which it is entitled by that deadline.

WHEREFORE, Plaintiff moves the Court enter an order setting its Motion to Compel (Doc. 81) for hearing on September 21, 2018, or as soon as practicable, and to the extent the Court finds in Plaintiff’s favor, to order MSD Defendants to respond to such discovery by October 22, 2018, and for such other and further relief as this Court deems just and proper.

Respectfully submitted,

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he caused to be served a true and complete copy of the foregoing upon all counsel of record this 19th day of September, 2018, by filing same with the Court's electronic filing system.

/s/ Steven R. Kratky